

EXHIBIT 7

MATTHEW PLOSAJ
6/15/2021

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

HUNTERS CAPITAL, LLC, et al.,)	
Plaintiffs,)	
vs.)	No. 20-cv-00983-TSZ
CITY OF SEATTLE,)	
Defendant.)	

ZOOM VIDEO DEPOSITION UPON ORAL EXAMINATION
OF
MATTHEW PLOSAJ

10:30 a.m.
June 10, 2021

*** This transcript is marked confidential. ***

REPORTED BY: Pat Lessard, CCR #2104

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1 Q. Why was it hard to sleep?

2 A. There were people on my street every night
3 shouting into a bullhorn until odd hours of the
4 morning.

5 Q. Were the protests localized at the East
6 Precinct around the time when they began in May of
7 2020?

8 A. Largely, yes. However, I'm aware there were
9 protests throughout the city and oftentimes the
10 protests would move around.

11 But it was a nightly occurrence around the
12 East Precinct in addition to whatever else was
13 occurring.

14 Q. Other than making it hard to breathe and
15 hard to sleep were there other ways that the protests
16 in May of 2020 regarding the George Floyd murder
17 affected your experience of living at your East Pine
18 Street apartment?

19 A. I'm sorry. Could you repeat that, please?

20 Q. Other than your description that the
21 protests affected your life because it was hard to
22 breathe and hard to sleep, were there other ways that
23 the protests that started in May 2020 affected your
24 life?

25 A. Yes.

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1 A. Not that I can articulate at this point but
2 I'm sure in some way it had.

3 Q. Was your access to your apartment restricted
4 in any other way other than having to show ID?

5 A. I would have to walk through crowds to get
6 to the point where I could show my ID.

7 Q. Do you have a car?

8 A. I do.

9 Q. Do you park at your apartment?

10 A. No.

11 Q. Where do you park the car?

12 A. Behind Langston Manor Apartments at 19th and
13 Republican.

14 Q. How long have you parked your car there?

15 A. I don't remember specifically but it's fair
16 to say maybe five or six years.

17 Q. So when you were working through crowds to
18 show your ID to get to your apartment in May of 2020,
19 were you working through those crowds on foot?

20 A. Correct.

21 Q. Were there any barriers or other
22 obstructions apart from the crowds that affected your
23 ability to access your building at East Pine Street?

24 A. Not before CHOP, no.

25 Q. Where did you live before you moved to the

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1 A. Yes.

2 Q. Those are the ones that were in place
3 approximately one week into CHOP in June, right?

4 A. Correct.

5 Q. Okay. Where were those?

6 A. When?

7 Q. When they were installed where were they?

8 A. When they were installed they were installed
9 on 12th Avenue, and I believe on Pine Street west of
10 the median of 12th.

11 Q. Did that change?

12 A. Yes.

13 Q. Where did they go to next?

14 A. I don't know where all of them went, but I
15 know a good portion of them were moved onto --
16 perpendicular of where they were onto Pine Street, in
17 between 12th and 13th.

18 Q. When did that happen?

19 A. Oh, perhaps a week or two later. I don't
20 remember specifically.

21 Q. There were also barriers you said on Pike,
22 correct?

23 A. I don't know if they actually hit Pike
24 Street but roughly to the cross section. They might
25 have stopped shy.

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1 onto Pike -- again, somewhere along that stretch
2 closer to Pike.

3 Now following Pine from 12th Avenue we go
4 looking left or west there were barricades on that
5 street before you hit Pike and at some point going
6 into paralleling Cal Anderson. I can't remember the
7 specific location but that one street that is north
8 one block of Pine.

9 And then I believe there was another barrier
10 that I recall moving west, so now two blocks west of
11 12th Avenue. Again, in between Pine and Pike I
12 believe there was another barrier.

13 Q. Which barriers affected your access to your
14 building?

15 A. All of them.

16 Q. How did the barrier at Pine and Broadway
17 affect your access to your building?

18 A. There was no way I could go around it.

19 Q. Could you access your building by car?

20 A. No.

21 Q. Could you access your building by foot?

22 A. Sometimes.

23 Q. When couldn't you access your building by
24 foot?

25 A. When a handful of occurrences within CHOP at

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1 times.

2 Q. What prevented you from accessing your
3 building by foot?

4 A. CHOP security.

5 Q. Your testimony is that on a handful of
6 occasions CHOP security prevented you from entering
7 your building?

8 A. That is correct.

9 Q. When did that occur?

10 A. Roughly the night someone jumped on my
11 building. Perhaps a week into CHOP, maybe two weeks
12 into CHOP.

13 Q. Did anyone from the City ever prevent you
14 from accessing your building?

15 A. No.

16 Q. Was your trash picked up during the time
17 period of CHOP?

18 A. Never, that I recall.

19 Q. Did you have electrical service during the
20 time period of CHOP at your building?

21 A. Yes.

22 Q. Did you have other utilities in your
23 building during the time period?

24 A. Did I have other utilities?

25 Q. Yes.

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C E R T I F I C A T E

STATE OF WASHINGTON)
) ss.
COUNTY OF KING)

I, the undersigned Washington Certified Court Reporter, hereby certify that the foregoing deposition upon oral examination of MATTHEW PLOSZAJ was taken stenographically by me on June 10, 2021, and transcribed under my direction;

That the witness was duly sworn by me pursuant to RCW 5.28.010 to testify truthfully; that the transcript of the deposition is a full, true, and correct transcript to the best of my ability; that I am neither attorney for nor relative or employee of any of the parties to the action or any attorney or counsel employed by the parties hereto, nor am I financially interested in its outcome.

I further certify that in accordance with CR 30(e) the witness was given the opportunity to examine, read and sign the deposition within 30 days upon its completion and submission, unless waiver of signature was indicated in the record.

IN WITNESS WHEREOF, I have hereunto set my hand and seal this 15th day of June, 2021.

Pat Lessard

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